EXHIBIT 4

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

H. CRISTINA CHEN-OSTER; LISA PARISI; and SHANNA ORLICH,

Plaintiffs,

10 Civ. 6950 (LBS) (JCF)

VS.

GOLDMAN, SACHS & CO. and THE GOLDMAN SACHS GROUP, INC.

Defendants.

DECLARATION OF VISHALI CHANDRAMOULI

- I, Vishali Chandramouli, hereby affirm under oath that the following is true and correct:
- 1. My name is Vishali Chandramouli. I am over 18 years old and am competent to make this statement. I am Senior Tech Development Manager with the consulting services firm Hewitt Associates LLC ("Aon Hewitt"), which provides human resources consulting services to leading organizations around the world. My responsibilities in this position include overall PeopleSoft application development and system delivery. My team includes the technical system analysts who are responsible for business and technical consulting and information management. This declaration is based on my personal knowledge and information available to me in my work at Aon Hewitt.
- 2. Aon Hewitt has a consulting services agreement with Goldman Sachs. Pursuant to this agreement, beginning in September 2004 Aon Hewitt assumed the responsibility of hosting Goldman Sachs' primary Human Resources database, PeopleSoft.

- As part of this ongoing relationship, Aon Hewitt is responsible for 3. maintaining Goldman Sachs's PeopleSoft database, and for incorporating into the database new and updated information on Goldman Sachs employees based on change requests and new business requirements from Goldman Sachs Human Capital Management group.
- I have reviewed the Affidavit of Cathy Obradovich, which is attached as 4. Exhibit 1 to this declaration (the "Obradovich Affidavit"). I have also reviewed Exhibits 3 and 4 to the transcript of Ms. Obradovich's deposition testimony in this lawsuit, attached as Exhibit 2, and the list of PeopleSoft data fields referenced in the Obradovich Affidavit, which is attached as Exhibit 3.
- 5. I understand that the Plaintiffs in the Goldman Sachs litigation seek to compel the production of data found on the PeopleSoft system hosted by Aon Hewitt on behalf of Goldman Sachs. I also understand that Plaintiffs believe that Goldman Sachs should be able to produce the requested data with far less burden than is spelled out in the Obradovich Affidavit, and that Plaintiffs believe that much of this increased efficiency could be achieved by engaging Aon Hewitt to assist in pulling the data and creating the database extracts. As set out in greater detail below, and subject to the assumptions described, I do not agree with these contentions.
- 6. I understand that the data extract in question would be comprised of the information in approximately 250 selected PeopleSoft data fields, out of the thousands of fields contained in the database Aon Hewitt maintains, for all employees who worked as Associates or Vice Presidents in "R" jobs (revenue generating jobs) in the four Goldman Sachs revenue divisions involved in the litigation – Securities Division, Investment Management Division,

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Investment Banking Division, and Merchant Banking Division – since 2002. Thus, the data extract involves:

- (a) scope limitations only the four identified divisions,
- (b) position limitations only the Revenue-coded Associate and Vice President positions,
- (c) temporal limitations only persons who were in the identified divisions and positions at any time since 2002, and
- (d) field limitations only the selected data fields, rather than the thousands of available data fields.
- Based upon the required scope, position, temporal and field limitations, I 7. believe that the time estimates set forth in the Obradovich Affidavit for a Goldman Sachs user to create the data extract from the current PeopleSoft database are reasonable. I also believe that the estimates for conducting quality control checks on that data are reasonable.
- 8. If Aon Hewitt personnel were to be engaged to create a comparable data extract, we would not use Query Studio. Rather, we would write SQL query scripts, similar to what is described in the Obradovich Affidavit for creation of a data extract from the predecessor PeopleSoft data system. In addition, quality checking as described in the Obradovich Affidavit would be required. I do not believe this approach would improve efficiency; even for an experienced Aon Hewitt consultant, skilled in the use of PeopleSoft and familiar with the Goldman Sachs PeopleSoft database we maintain, I believe that producing a quality-checked PeopleSoft data extract based on AON Hewitt's SQL approach would require approximately the same amount of time as estimated in the Obradovich Affidavit for producing a quality-checked PeopleSoft data extract by Goldman Sachs personnel using Query Studio.

- a. Many of the data elements requested are not straight pulls from the tables but are calculated fields. For instance, Aon Hewitt does not store as part of the PeopleSoft database Total GS Tenure in Years and Months. The employee could have had multiple stints at Goldman Sachs ("GS") and the current stint may be ongoing and hence Total GS Tenure must be calculated dynamically based on the total years and months of prior GS experience and the number of years and months since the most recent hire/rehire date. Likewise, Aon Hewitt does not store an EMD date field – This is a calculated field that looks at the earliest date in current employment when the employee was assigned an Officer code of EMD. Altogether, around 50 of the approximately 250 data fields on Exhibit 3 need to use complex sub-queries and functions to calculate the values.
- b. Aon Hewitt stores organization and security information since 2004 – However, data older than a year is archived in a separate database. This archived data for 16 organization level data elements is spread across several different tables, each of which range in size from 5 million to 50 million rows of information. Joining these tables to find the divisional and level information requested will be performance prohibitive and may lead to disruption of normal business operations for Aon Hewitt users and all Goldman Sachs employees working on Aon Hewitt's

PeopleSoft system globally. The Aon Hewitt PeopleSoft system is used by Goldman Sachs for Human Capital management and selfservice. For instance, employees could access the system to review their benefits, perform Transfer, Leave transactions on other employees, update their address, education information, review policies and so on.

- c. Aon Hewitt has certain flat tables on the data warehouse which aggregate the information from several different tables since 2004. The team members working on Production and Archive databases have knowledge of those databases and their resident tables only. The team working on data warehouse has knowledge of the flattened tables in the warehouse only. Since we need data from different databases (Current Production, Archive and Warehouse) and from tables whose key structures are vastly different, any time savings from using these flat tables will be offset by the time spent retrieving from and reconciling different databases.
- d. Aon Hewitt consultants for Goldman Sachs are organized by business process knowledge. The 250 data fields span various business processes such as Transfer, Security, Flexible Work Arrangements, Short Term Assignments, Leaves, and Personal Data changes. This means that Aon Hewitt would need those subject matter experts (SME) to weigh in while joining the data from those business-process-specific tables. Those SMEs would

- also need to be available to perform quality assurance checks in delivering accurate data.
- An employee could go through multiple job transactions, such as transfers, flexible work arrangements and leave, during their tenure. Also, they could have multiple rows of licenses, accomplishments, and prior work information. If an employee, for instance, has gone through 2 transfers, has 2 degrees, has worked at 3 prior companies, has had 1 leave, 2 short-term-assignment, 1 flexible work arrangement, then the number of rows on this report for this employee alone would be 2x2x3x1x2x1 which would be 24 rows of information. Performing Quality Assurance checks on this data will likely exceed the 80 hours listed in Page 3 of the Obradovich Affidavit.
- 9. Aon Hewitt is not involved in the use or maintenance of the other databases referenced in the Obradovich Affidavit (the Goldman Sachs pre-2004 PeopleSoft data system, the proprietary Compensation Recommendation System, the proprietary Firmwide Review System, and the proprietary Extended Managing Director Selection database), and I have no reason to dispute the accuracy of the time estimates contained in the Obradovich Affidavit for preparing extracts from them. Given our lack of involvement with these other databases, I see no reason to believe that Aon Hewitt personnel could prepare those extracts more efficiently than Goldman Sachs personnel.
- 10. I understand that Plaintiffs suggest that the creation of a litigation database could be accomplished more efficiently using a "data dump" or "data backup" process. Such a

process, however, would create a mirror of the entire database, and thus would not comply with the aforementioned scope, position, temporal and field limitations.

database could be accomplished more efficiently using a process of exporting (downloading) each PeopleSoft table to a database, such as Access or Excel, rather than using Query Studio or SQL queries. This approach, however, would not comply with the aforementioned scope, position, temporal and field limitations. In order to create the appropriate database from this series of hundreds of exported tables, the user would need to invest substantial additional time and resources to eliminate the unwanted fields and employee population, and would need to invest further time to relate elements in one data table to elements in others in order to create the actual data fields needed for the final database. Also, given that we are looking at millions of rows of organization information and employee history, an Access or Excel database may not hold up and will face performance constraints. In my opinion, this approach would not be more efficient in creating an accurate and usable database than that described in the Obradovich Affidavit.

I declare under penalty of perjury that the foregoing is true and correct.

Date May 30, 2012.

Vishali Chandramouli

EXHIBIT 1

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

H. CRISTINA CHEN-OSTER; LISA PARISI; and SHANNA ORLICH,

Plaintiffs,

10 Civ. 6950 (LBS) (JCF)

VS.

GOLDMAN, SACHS & CO. and THE GOLDMAN SACHS GROUP, INC.

Defendants.

AFFIDAVIT OF CATHY OBRADOVICH

- I. Cathy Obradovich, hereby affirm under oath that the following is true and correct:
- 1. My name is Cathy Obradovich. I am over 18 years old and am competent to make this statement. I am a Vice President in the Compensation Group of Goldman, Sachs & Co. ("Goldman Sachs"). My team includes the staff members who maintain and oversee the PeopleSoft and Compensation Recommendation System ("CRS") databases. This affidavit is based on my personal knowledge and information provided to me by my team members, on whom I regularly rely in performing my work for Goldman Sachs.

PeopleSoft Database

2. PeopleSoft is Goldman Sachs' primary Human Resources database. In September 2004, we moved to a new version of PeopleSoft, which effectively resulted in the creation of two PeopleSoft databases: one containing data collected in September 2004 and before ("the Earlier Database"), and one containing data created after September 2004 ("the Current Database"). Although Goldman Sachs still maintains and possesses the data from the

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Earlier Database, the data from this system is not readily translatable to the Current Database. Producing this earlier data would entail an entirely separate collection effort from the effort necessary to collect data from the Current Database.

- Extracting data from either of the PeopleSoft databases is a detailed and 3. difficult process. Goldman Sachs has just two key staff members who have the knowledge and skills necessary to extract data from the PeopleSoft database. Given all the day-to-day operations of the firm that require work by these same individuals, it would be necessary to have one of those staff members remain dedicated to accomplishing as much of the regular work as he could. Even so, having the remaining individual dedicate his time exclusively to extracting data and responding to data requests for the litigation would impose a significant burden and detrimental impact on our other critical operations and projects.
- I understand that Plaintiffs in this litigation have suggested that we should 4. be able to accomplish the necessary work by hiring temporary "consultants" who have general expertise in utilizing the PeopleSoft system. As set forth in more detail below, in my opinion such an approach would be entirely unworkable, totally aside from the out-of-pocket costs involved. I came to Goldman Sachs laterally approximately two years ago, and have observed first-hand just how idiosyncratic the Goldman Sachs PeopleSoft databases are. I have observed personally the difficulties that any company faces when hiring external IT consultants to conduct major data extractions in a reliably accurate fashion, and those difficulties would be exacerbated here by the intricacies of the Goldman Sachs systems. I do not believe that any material amount of the time of the two key IT staff members would be saved by hiring external consultants, as they would be the very people who would have to train the consultants, constantly respond to inquiries from them, and supervise their work to ensure accuracy.

Pulling PeopleSoft Data from September 2004-December 2011

- 5. I understand that the plaintiffs in this case have requested PeopleSoft data, inter alia, for all employees who worked in revenue-producing jobs as Associates or Vice Presidents in the four revenue divisions from September 2004 to December 31, 2011 the period covered by the Current Database for the very large array of data fields previously identified to plaintiffs. I have discussed this extensive data request with my team. Based on their input, I have determined that a "best case" estimate for extracting this data is that it would require 90 to 150 hours of dedicated time (assuming no interruptions) by a dedicated Goldman Sachs staff member. Pulling this data would require our team to engage in extensive programming to create queries to properly specify the population of current and former employees to be included in the extracted population, and the data fields to be extracted. We would then have to analyze the filtered data to arrange it in the requested format, and then address any unexpected issues related to extracting the data covering this period.
- 6. This "best case" estimate reflects only the time required to pull the data itself. Performing a standard quality check or "QC review" of this data, to ensure its accuracy and reliability, would require another 40 to 80 hours of dedicated time by one of the same two staff members on our team.
- 7. Thus, the estimated minimum amount of time it will require from a dedicated staff member with the necessary PeopleSoft expertise to produce the requested data just from the September 2004 to December 2011 period would be 130 hours. Based upon my experience and that of my team members, however, I have found that projects seldom can be accomplished in the "best case" estimated time frame. A more likely estimate of time, in my opinion, is 230 hours. Also, if significant unexpected issues arise, it may take even longer to get a reliable data extract covering this time period.

- I understand that Plaintiffs' counsel have also requested data from January 2002 through August 2004. Extracting PeopleSoft data from the Earlier Database (covering data from that period) would be a much more involved, difficult, and costly process (in terms of resource expenditure and allocation), and even then the data could not be readily translated into a format that matches up with the more current data. First of all, the Earlier Database retained far less organizational data regarding firm employees than the Current Database. Second, at the time of the PeopleSoft transition, we did not migrate information regarding former employees to the new PeopleSoft data structure. Third, given the constantly changing organizational structure of the revenue divisions at the department and desk level, it would be remarkably difficult to try and identify detailed organizational information for employees in this earlier data period, and even then the organizational groupings and structure in this earlier data cannot be translated or matched up in the database with the organizational structure used after late 2004.
- 9. Pulling this older data would require multiple steps. First, a dedicated staff member would have to do the programming to create entirely new queries that will function with the PeopleSoft 7.5 system used in the Earlier Database; we could not just duplicate the programming necessary for the queries from the more recent database. Then, once those queries are developed and run against the Earlier Database, we would have to analyze the data to ensure that the proper population was identified, and create additional queries to pull the requested data on this population into an extract from the various data tables, including the transactional data tables, education data tables, prior work data tables, etc. Based upon information from my team, my best estimate is that these efforts would require 160 to 240 hours of dedicated work.

- 10. Performing the QC review of this older data would also be very time intensive. My best estimate is that this would require an additional 40 to 80 hours of dedicated time by one of our staff members.
- Thus, our best available estimate is that pulling, preparing and QC-11. checking this earlier data would entail approximately 200 to 320 hours of dedicated time by one of our two staff members who has the expertise to handle the request. This would require our other staff member with PeopleSoft expertise to manage all day-to-day requests relating to this database firmwide.
- This estimate would be in addition to the estimated 130 to 230 hours of 12. this same staff member's time necessary to extract data from the September 2004-December 2011 time period contained in the Current Database.
- 13. In other words, if our team is asked to extract PeopleSoft data from both the Current Database and the Earlier Databases, going back to include the period between January 2002 and September 2004, our team will have to devote a dedicated staff member to the project for somewhere between roughly 8 and 14 weeks. This would leave us with only one staff member with PeopleSoft expertise to address all operational issues, database maintenance, and ongoing projects. This would impose a significant burden on our team.
- Unfortunately, there is no way for another Goldman Sachs employee to 14. step in and take over these functions. Our team responds to and addresses complicated database inquiries and only someone intimately familiar with the Goldman Sachs PeopleSoft database can handle these functions. A staff member from another team or group will not have the PeopleSoft expertise or the familiarity with our reporting functions and the types of requests we receive from our internal customers to fill in for one of our staff members.

- 15. Nor can we efficiently "outsource" the extraction of data from our systems, especially with respect to the PeopleSoft data in the Earlier Database, to an outside vendor or contractor. Because there are fields and tables in the Earlier Database that are not used or compatible with our current system, extracting the earlier data must be done by someone with detailed institutional knowledge of Goldman and its systems. In addition to the 4 to 5 months of training that would be necessary to deal with extracting the data in the Current System, the additional training one of our staff members would have to conduct to transfer the level of added knowledge and information necessary to enable someone outside Goldman Sachs to extract this earlier data would itself require at least another month of dedicated time; the fields and tables in the PeopleSoft system in the Earlier Database are not named or stored in an intuitive format, and thus, someone generally familiar with relational databases like PeopleSoft would not be able to understand how Goldman used, organized, and stored this data without significant technical assistance from one of our staff members. All told, our team estimates that it would take at least five to six months for an outside vendor or contractor to: (1) gain the level of institutional knowledge necessary to extract pre-September 2004 PeopleSoft data from the Earlier Database, and the later data from the Current Database, and (2) perform the actual data extraction and review; during much of this time one of the two appropriately skilled Goldman Sachs IT team members who otherwise would be extracting the data themselves would be heavily absorbed in training, supervising and checking the work of those vendors or contractors.
- 16. We estimate that a specialty temporary agency with contractors having the necessary PeopleSoft skills to take on this lengthy project would charge approximately \$100-135 per hour for the services of such a contractor. Thus, assuming Goldman Sachs were to utilize such an agency, and could find such a consultant, and further that the consultant remained on the

project without interruption or early termination after being trained, the out-of-pocket costs would be at least \$80,000. In addition, however, Goldman Sachs would still have to bear the loss of a very substantial amount of the internal expert's time throughout this five-to-six-month period.

Compensation Recommendation System

- 17. Goldman Sachs' Compensation Recommendation System ("CRS") is a database that tracks the results of the annual year-end compensation review process. Based on information from my team, I estimate that it would take a minimum of 40 hours just to pull data from this database for the four Revenue Divisions, for employees who worked as Associates or Vice Presidents, in "R" (revenue-generating) jobs from January 1, 2002 to December 31, 2011 (for the fields previously identified to plaintiffs).
- 18. However, it would take considerably more time and effort to do a QC review of any data extracted from the CRS database. This is because the CRS data is not maintained in a user-friendly format; someone from the CRS team must manually review and check all data that is pulled from the database. The steps involved in this QC process would require an extraordinary amount of effort and resources. The data extract from CRS will consist of thousands of rows, dozens of columns, resulting in more than two million data cells that require validation. Additionally, employee records will appear across multiple rows, requiring further time devoted to data reorganization and cleaning. Given the lack of automated validation queries or systems in place, staff members from the CRS team would have to be pulled from ongoing work and dedicated to doing a manual review of this data. This review would require team members to go through every record and field to ensure that data is correct and research any discrepancies in order to explain anomalies. Many of our team members were not at the firm going back to 2002, which will make it all the more difficult to validate this data. Also, certain

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elements of compensation may be related to a particular group of individuals or programs that that no longer exist at the firm, which will require even more diligence and work to validate. Based upon information provided by our CRS team, I estimate that it would take at least 240 hours of work, spread across at least three dedicated team members, to conduct and complete this QC review.

19. In total, my best estimate is that in order to extract data from the CRS database and do the necessary manual QC review would take a minimum of 280 hours of dedicated time.

I declare under penalty of perjury that the foregoing is true and correct.

Cathy Obradovich (28 U.S.C. § 1746)

Cathy Obradoud

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

H. CRISTINA CHEN-OSTER; LISA PARISI; and SHANNA ORLICH,

Plaintiffs,

10 Civ. 6950 (LBS) (JCF)

vs.

GOLDMAN, SACHS & CO. and THE GOLDMAN SACHS GROUP, INC.

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2012, I caused a copy of the Affidavit of Cathy.

Obradovich to be served by electronic mail on:

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Dated: New York, New York April 3, 2012

By:

Érin E. LaRuffa

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EXHIBIT 2

Process1: Identy the who worked in revenue-producing jobs as Associates or Vice Presidents in the four revenue divisions

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ļ	Prepare and test and run a query to identify Active	
	employees in revenue producing divisions as of 01-01	
1.1	2002 (Begin population)	
	From the above population in Step1, Filter out VPs	
	and Associates; Then filter out the employees with	
1.2	Job codes starting with "R"	1
	Run a query Prepare and testd in Step1 to identify	
	Active employees in revenue producing divisions as	
1.3	of 08-31-2004	1
		1
	From the above population in Step3, Filter out VPs	
	and Associates; Then filter out the employees with	
1.4	Job codes starting with "R" (End Population)	1
	Prepare and test and run a query to identity all	
	employee HIRES in revenue producing divisions	
1.5	between 01-01-2002 to 08-31-2004	4
•••••	From the above population in Step5, Filter out VPs	-
	and Associates; Then filter out the employees with	
1.6	Job codes starting with "R"	1
jQ		
ve	Prepare and test and run a query to identity all	
	employee TERMINATIONS in revenue producing	
1.7	divisions between 01-01-2002 to 08-31-2004	o
	From the above population in Step7, Filter out VPs	8
	and Associates; Then filter out the employees with	
1.8	Job codes starting with "R"	1
		1
	Prepare and test and run a query to identity all	
	employee TRANSFERS INTO revenue producing	
1.9	divisions between 01-01-2002 to 08-31-2004	4
********	From the above population in Step9, Filter out VPs	
ر ر	and Associates; Then filter out the employees with	
1.10	Job codes starting with "R"	1
••••••		1
	Prepare and test and run a query to identity all	
	employee TRANSFERS OUT of revenue producing	
1.11	divisions between 01-01-2002 to 08-31-2004	2
	From the above population in Step11, Filter out VPs	2
	and Associates; Then filter out the employees with	
1.12	Job codes starting with "R"	1
	Combine all the employee IDs from Step2,4,6,8,10	
	and 12; These are the employee IDs of employees	
	who worked in revenue-producing jobs as Associates	
	or Vice Presidents in the four revenue divisions	рерозитом ехнівіт

Process2: Pull Employee
Demographics data (around 114
data elements) for the Employee
IDs identified in Process1. Pull all
transactions for these IDs since
their original hire date. The data is
pulled from multiple tables

			Estimat
No.	Details	Data Elements	es
		Emplid, Name, Effective	
		date, Action, Action	
		Reason, Effseq, FTE, Employee Status	
		Description, Employee Type	
		Description, Employee	
		Classification	
		Description,Regular/Tempo	
	Prepare and test a query to pull complete	rary Description,Full/Part	
		Time Description,FLSA	
	identified Employee IDs; The data elements needs to	•	
2.1	pulled corresponding to effective date of the transaction.	Code, Jobcode, Status title	
Z. I	u ansaction.	etc.,	24
	Prepare and test a query to pull Diversity data for		
	identified Employee IDs. This data is pulled from 4	Gender, Ethnicity,	
	different tables. Citizneship data is stored in multiple	Citizenship and Date of	
2.2	rows and need to converth them to Columns	Birth	4
	Prepare and test a query to pull Hire Date, Rehire		
	Date, VP date,EMD Date and PMD Date for identified		
2.3	Employee IDs. This data is pulled from running 4 different queries		_
٠.٠.	unieren queries		4
		Prior GS Tenure, Calculate	
	Prepare and test a query to pull Tenure data for	Current GS Tenure and	
2.4	identified Employee IDs.	Total GS Tenure	4
		Divisia - Indian	
		Division Industry Description,Division	
		Function	
		Description, Division Job	
		Title Description, Division	
	Prepare and test a query to pull Divisional specific	Role 1-5 Description and	
	job data for identified Employee IDs.	Job Function Description	4
	Prepare and test a query to pull Class Year		
2.6	information for identified Employee IDs.	ANA Year, MBA Year, MBL Ye	2
	Prepare and test a query to pull Hire details for	Hire Type, Referral Source	
		THE IVER REPORTS SOURCE !	

Process3: Pull Additional data sets for the Employee IDs identified in

Process1.

			Best Estimat
No.	Details	Data Elements	es
		Tanna Data Tanna Tuna	
		Term Date, Term Type,	
		Term reason, Last day on	
		premises, 2nd and 3rd term	
	Prepare and test a query to pull Termination details	reasons, New Employer, GS	
2.8	for identified Employee IDs.	Tenure till term date	8
	Prepare and test a query to pull Geographical details		
2.9	for identified Employee IDs.	Office and Region	3
	Prepare and test a query to pull Organizational	DBS Code, DBS description,	
	details for identified Employee IDs. We do not have	Division, Report Group, Sub	
2 10	17 level org tree prior to 2004 September	Division and Business Unit	1
2.10	17 level of tree prof to 2004 September	DIVISION AND BUSINESS ONL	4
	Prepare and test a query to pull various DBS codes	Expense DBS, Payroll DBS,	
2 11	for identified Employee IDs.	Home DBS, Host DBS	3
	To rue rume employee 103.	Home DB3, Host DB3	3
		Base Salary, Currency, Base	
	Prepare and test a query to pull Base Salary Data for	Sal (USD), Total Salary,	
2.12	identified Employee IDs.	Total Sal Currency	12
•••••		Degree, School, Degree	
	Prepare and test a query to pull education details for	Date, Graduation Indicator,	
3.1	identified employee IDs	Major1, Major2	12
		License, Issue date, issued	
	Prepare and test a query to pull License details for	by, Verified?, Expiration	
3.2	identified employee IDs	Date, State, Country	12
		LOA type, begin date, end	
	Prepare and test a query to pull Leave of Absense	date, FMLA leave details	
3.3	details for identified employee IDs	etc.,	12
		Prior company, from & to	
	Prepare and test a query to pull Prior Work (non GS)	date, postion, industry	
3.4	details for identified employee IDs	type, work type	12
	Propago and toot a guery to will all Base Cala	Calama Tarana Calama	
3.5	Prepare and test a query to pull all Base Salary details for identified employee IDs	Salary Type, Salary Amount,	
ب.ر	ractans for racitanea employee IDS	Currency and Effective Date	12

3.5 details for identified employee IDs Currency and Effective Date 12

Nor STA ON TWA prior to Syst 2004 (14xWW)

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Details

Details Case 1:10-cv-06950-AT-RWL 95 Best **Estim** Pulling PeopleSoft Data from ates September 2004-December 2011 No. Details Process1: Identy the who worked in revenue-producing jobs as Associates or Cognas Resulty Tool

Quey tuokes - Hewet -Vice Presidents in the four revenue divisions Prepare and test and run a query to identify Active employees in revenue producing divisions as of 09-01-2004 (Begin population) 1.1 Download inter Creel From the above population in Step1, Filter out VPs and Filter on correct and Associates: Then filter out the employees with Population 1.2 Job codes starting with "R" People Soft is a tesusochon dito love nat cire tag Run a query Prepare and testd in Step1 to identify Active employees in revenue producing divisions as seletine marghout pl multiple Quence. 1.3 of 12-31-2011 Dependent Hues of Limited of Junior States of Line of Limited and Junior States of Limited and Limi From the above population in Step3, Filter out VPs and Associates; Then filter out the employees with Job codes starting with "R" (End Population) Prepare and test and run a query to identity all employee HIRES in revenue producing divisions 1.5 between 09-01-2004 to 12-31-2011 From the above population in Step5, Filter out VPs and Associates; Then filter out the employees with Several else lun date 1.6 Job codes starting with "R" Prepare and test and run a query to identity all employee TERMINATIONS in revenue producing 1.7 divisions between 09-01-2004 to 12-31-2011 From the above population in Step7, Filter out VPs and Associates; Then filter out the employees with Job codes starting with "R" Prepare and test and run a query to identity all employee TRANSFERS INTO revenue producing 1.9 divisions between 09-01-2004 to 12-31-2011 From the above population in Step9, Filter out VPs and Associates; Then filter out the employees with 1.10 Job codes starting with "R" Prepare and test and run a query to identity all employee TRANSFERS OUT of revenue producing 1.11 divisions between 09-01-2004 to 12-31-2011 From the above population in Step11, Filter out VPs and Associates: Then filter out the employees with 1.12 Job codes starting with "R" Combine all the employee IDs from Step2,4,6,8,10 and 12; These are the employee IDs of employees who worked in revenue-producing jobs as Associates or Vice Presidents in the four revenue DEPOSITION EXHIBIT 1.13 divisions

Pulling PeopleSoft Data from				Best Estim
September 2004-December 2011	No.	Details	Data Elements	ates
Process2: Pull Employee Demographics data (around 114 data elements) for the Employee IDs identified in Process1. Pull all transactions for these IDs since their original hire date. The data is pulled from multiple tables	:			
John multiple tables John Museum Mu)	identified Employee IDs; The data elements needs to pulled corresponding to effective date of the transaction. Prepare and test a query to pull Diversity data for identified Employee IDs. This data is pulled from 4 different tables. Citizneship data is stored in multiple rows and need to converth them to Columns	Emplid, Name, Effective date, Action, Action Reason, Effseq, FTE, Employee Status Description,Employee Type Description,Employee Classification Description,Regular/Temporary Description,Full/Part Time Description,FLSA Status Description,Officer Code, Jobcode,Status title etc., Gender, Ethnicity, Citizenship and Date of Birth	6
JÚ a to w	2.3	Prepare and test a query to pull Hire Date, Rehire Date, VP date,EMD Date and PMD Date for identified Employee IDs. This data is pulled from running 4 different queries		2
Terme	2.4	Prepare and test a query to pull Tenure data for identified Employee IDs.	Prior GS Tenure, Calculate Current GS Tenure and Total GS Tenure	4
juranilint	2.5	Prepare and test a query to pull Divisional specific job data for identified Employee IDs.	Division Industry Description, Division Function Description, Division Job Title Description, Division Role 1-5 Description and Job Function Description	2
New	2.6	Prepare and test a query to pull Class Year information for identified Employee IDs.	ANA Year, MBA Year, MBL Year	2
Cheroup .	2.7	Prepare and test a query to pull Hire details for identified Employee IDs.	Hire Type, Referral Source and specific source	2

Pulling PeopleSoft Data from September 2004-December 2011

Lewwoodhurd Geographical DBS Saley

Process3: Pull Additional data sets for

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			Best	
			Estim	
No.	Details	Data Elements	ates	
		Town Data Torm Tuna Torm		
		Term Date, Term Type, Term		
		reason, Last day on premises,		
		2nd and 3rd term reasons, New		
	• • • • • • • • • • • • • • • • • • • •	Employer, GS Tenure till term		
2.8	for identified Employee IDs.	date	4	
	Prepare and test a query to pull Geographical		_	
2.9	details for identified Employee IDs.	Office and Region	2	
		DDC Cada DDC description		
	Prepare and test a query to pull Organizational	DBS Code, DBS description,		
	details for identified Employee IDs. We do not have	Division, Report Group, Sub	_	
2.10	17 level org tree puter to 2004 September	Division and Business Unit	2	
	Droppers and test a guary to pull various DDS codes	Evnanca DRS Payrall DRS		
7 4 4	Prepare and test a query to pull various DBS codes	Expense DBS, Payroll DBS, Home DBS, Host DBS	2	
2.11	for identified Employee IDs.	Home DB3, Host DB3		
		Base Salary, Currency, Base Sal		
	Prepare and test a query to pull Base Salary Data for			
2 12	identified Employee IDs.	Currency		
2.12	identified Employee 10s.	Currency		
		Degree, School, Degree Date,		
	Prepare and test a query to pull education details	Graduation Indicator, Major1,		
3.1	for identified employee IDs	Major2		
3.1	ion identified employee ibs	iwajorz		
		License, Issue date, issued by,		
	Prepare and test a query to pull License details for	Verified?, Expiration Date,		
3.2	identified employee IDs	State, Country		
J.2	Table 1 The second seco	i i i i i i i i i i i i i i i i i i i	·	
	Prepare and test a query to pull Leave of Absense	LOA type, begin date, end date,		
3.3	details for identified employee IDs	FMLA leave details etc.,	. (
; <u>.</u>		Prior company, from & to date,	·	
	Prepare and test a query to pull Prior Work (non GS)	• • •		
3.4	details for identified employee IDs	type		
}		-71		
	Prepare and test a query to pull all Base Salary	Salary Type, Salary Amount,		
3.5	details for identified employee IDs	Currency and Effective Date	(
	Prepare and test a query to pull Flexible Work	Salary Type, Salary Amount,		
3.6	Arrangement details for identified employee IDs	Currency and Effective Date	(
	Prepare and test a query to pull Short Term	Salary Type, Salary Amount,		
3.7	Assignment details for identified employee IDs	Currency and Effective Date	(

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EXHIBIT 3

Exhibit A -- Data Fields Included

Employee ID/CW ID

Name

Gender Description

Date of Birth

FTE

Status Title Description

Job Code

Job Code Description

Grade

VP Date

Employee Status Description

Regular/Temporary Description

Full/Part Time Description

FLSA Status Description

Officer Code

Prior GS Tenure (Years)

Prior GS Tenure (Months)

Current GS Tenure (Years)

Current GS Tenure (Months)

Total GS Tenure (Years)

Total GS Tenure (Months)

Division Industry Description

Division Function Description

Division Job Title Description

Division Role 1 Description

Division Role 2 Description

Division Role 3 Description

Division Role 4 Description

Division Role 5 Description

Job Function Description

Seconded Legal Entity

Seconded Entity Description

EMD Date

PMD Date

Action Description

Action Reason Description

Recent Hire Date

Referral Source Name

Specific Referral Source

Hire Type Description

Original Hire Date

Hire Date

Rehire Date

Termination Effective Date

Termination Date

Last Day of Premises

Last Day on Payroll

Voluntary / Involuntary Indicator

Voluntary Termination Reason

Termination Reason

Second Termination Reason

Third Termination Reason

New Employer Description

Actual Transfer Date

From Department ID

From Department Description

To Department ID

To Department Description

From DBS Code

From DBS Description

To DBS Code

To DBS Description

From DBS Legal Entity

From DBS Office

From DBS Responsibility Center

From DBS Person Code

From Jobcode

From Jobcode Description

From Location

From Location Description

To Location

To Location Description

From Status Title

From Status Title Description

From FTE

To FTE

From Region

From Region Description

To Region

To Region Description

Location Description

Region Description

Country

DBS Code

DBS Description

DBS Legal Entity

DBS Office

DBS Responsibility Center

Department

Department Description

Payroll DBS

Expense DBS

Host DBS

Revenue Federated Description (HR)

Division Group Description (HR)

Division Description (HR)

Report Group Description (HR)

Level 06 Description (HR)

Level 07 Description (HR)

Level 08 Description (HR)

Level 09 Description (HR)

Level 10 Description (HR)

Level 11 Description (HR)

Level 12 Description (HR)

Level 13 Description (HR)

Level 14 Description (HR)

Level 15 Description (HR)

Level 16 Description (HR)

Level 17 Description (HR)

Total Prior Years

Total Prior Months

Years since Undergrad Degree

Months since Undergrad Degree

Prior Company

Prior Position

Prior From Date

Prior To Date

Prior Industry

Prior Work Type

Prior Years

Degree

Degree Description

Degree Date Issued

Degree School

Degree Graduation Indicator

Degree Major Code

Degree Major Description

Degree Major 2 Code

Degree Major 2 Description

Job Code

Job Code Description

Job Code Effective Date

Job Code Action

Job Code Action Description

Job Code Action Reason

Job Code Action Reason Description

Department DBS Code

Department DBS Code Description

Department DBS Effective Date

Department Action

Department Action Description

Department Action Reason

Department Action Reason Descr

Department Location Description

Department Report Group Description

Department Division Description

FWA Status

FWA Start Date

FWA End Date

Request Date

Approval Date

Job Share

Part Time

Alternate Hours

Telecommuting

FTE

Location Standard Hours

FWA Hours

Monday Start Time

Monday End Time

Monday FWA Location

Tuesday Start Time

Tuesday End Time

Tuesday FWA Location

Wednesday Start Time

Wednesday End Time

Wednesday FWA Location

Thursday Start Time

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Second Friday FWA Location

Second Saturday Start Time

Second Saturday End Time

Second Saturday FWA Location

Second Sunday Start Time

Second Sunday End Time

Second Sunday FWA location

Leave Type Description

Leave Begin Date

Return Date

Number of Business Days Out

Paid/Unpaid

Absence Code Description

Medical/Non Medical Description

Leave Status Description

Leave Reason Description

FMLA Leave Reason

FMLA Leave Reason Description

Actual End of Leave

Last Date Worked Leave

STA Start Date

STA End Date

Host Department

Host Department Description

Host Office

Host Office Name

Host Contact

Host DBS Code

Host DBS Description

Home/Host Classification

Home DBS Code

Home DBS Description

Home HRWWs Department

Home HRWWs Department Description

Change in Campus

Host Company

Host Pay Group

Headcount Based on

On Secondment?

License Name

License Number

License Issue date

License Issued by

License Issued State

License Issued Country

License Verified?

License Expiration date

Referral source

Base Salary

Base Currency

Draw Salary

Draw Currency

Supplimental Salary

Supplimental Currency

Shift factor

Shift Amount

Shift Currency

Comp Type Code

Comp Type Description